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STATE OF KANSAS

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DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field

Topeka, Kansas 66620-0001

Phone (913) 296-1500

Mike Hayden, Governor

Stanley C. Grant, Ph.D., Secretary

Gary K. Hulett, Ph.D., Under Secretary

October 30, 1987

David Trombold  
Hazardous Waste Coordinator  
Conservation Services, Inc.  
2525 North New York  
Wichita, KS 67219

Re: Follow Up On RCRA Compliance Letter Dated 8/4/87  
EPA ID number KSD007246846

Mr. Trombold:

On 10/22/87 a follow up inspection of your facility was conducted by this department to determine compliance with hazardous waste regulations and, specifically, with the terms of my 8/4/87 letter.

Based on information gathered during the inspection, and from correspondence you sent me 9/22/87, your facility is now considered in substantial compliance with hazardous waste regulations.

Your cooperation with the Hazardous Waste Management Program is appreciated.

Sincerely,

Dale T. Stuckey  
Inspections and Enforcement Section  
Bureau of Waste Management

c: Tom Gross  
J.P. Goetz

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NOV 13 1987  
RCOM SECTION



R00001601  
RCRA Records Center



**CONSERVATION SERVICES, INC.**

2525 N. NEW YORK  
WICHITA, KANSAS 67219  
(316) 267-5742

September 22, 1987

Mr. Dale Stuckey  
KDHE Inspection and Enforcement Section  
Bureau of Waste Management  
3244 E. Douglas  
Wichita, KS 67208

Dear Mr. Stuckey:

In response to your inspection follow-up letter of August 4, 1987, I will address each of the items that you found out of compliance.

1. As a result of the telephone conversation that we had concerning a separate analysis for each dry cleaner still bottom wastestream, you were going to check further to see if this type of analysis was necessary. Apparently Safety Kleen has an exemption from these analyses at their collection facilities since the wastestream cycle is considered a closed system. I believe the same exemption applies to CSI. It should be noted that we do analyze the dry cleaning still bottoms on a composite basis of approximately 10 drums for solvent composition and pH or BTU/lb and pH before the waste is processed or forwarded to another facility. (See enclosed analysis). We also have a generator audit for each dry cleaner wastestream which identifies the wastestream as a uniform, industry wide wastestream. Enclosed is a generator audit form and the analysis plan for dry cleaners which appears in December 6, 1984, Part B update.

2. Our driver has been given more strict parameters by which to reject or accept waste drums to prevent these drums from entering our storage area. In addition the drums that you noted as excessively rusted and dented have been either processed or repackaged.

3. All of the drums have been identified either by existing labels, such as the caustic drum that you referred to, or by gas chromatograph analysis for solvent drums with uncertain identity. The solvent drums were there as a result of cleaning out the bulk solvent truck, which was recently sold. Unfortunately, old drums were used to collect the solvent taken from the bulk truck. These drums were found to contain mostly flammable solvents with some chlorinated solvents thus qualifying the waste for cement kiln fuel. (See enclosed analysis results). They have been disposed of as cement kiln fuel. Drums containing any single components will be recycled.

The caustic drum is used for in-house neutralization of acid solutions. The Service Chemical employees have been reminded to keep corrosives separate from other solvents and also to notify Conservation Services if there are any waste solvent drums accumulated so that they can be handled properly and in a timely manner.


4. CSI's driver and process technicians have been advised to be more alert to catch incomplete hazardous waste labels and see that they are completed.

5. Enclosed is an updated closure cost estimate including incineration costs. New closure cost estimates requirements also prescribe that an independent contractor be used to perform the closure rather than internal personnel. HRI, out of Tulsa, would be able to do this.

In addition CSI has been sending notification forms with each shipment of F-listed solvents offsite.

If you have any questions, please contact me at 267-5742.

Yours truly,



David Trombold  
Hazardous Waste Coordinator

DT/mb

12/22/86

Date \_\_\_\_\_ Source 1363 Perc Still bottoms

## Organics

Note: organic composition presented as area percent of FID/GC plot.

Signature: Charles Lewis



HAZARDOUS WASTE PROFILE SHEET  
( DRY CLEANER ONLY )

CONSERVATION SERVICES, INC.  
2525 N. NEW YORK  
WICHITA, KANSAS 67219  
(316) 267-5742

GENERATOR \_\_\_\_\_ EPA ID # \_\_\_\_\_  
ADDRESS \_\_\_\_\_ P.O. BOX \_\_\_\_\_ PHONE # \_\_\_\_\_  
CITY/STATE \_\_\_\_\_ ZIP CODE \_\_\_\_\_ CONTACT \_\_\_\_\_  
US DOT SHIPPING NAME Waste Perchloroethylene HAZARD CLASS ORM-A  
UN OR NA # UN 1897 EPA WASTE NUMBER(S) F002

SPECIFIC WASTESTREAM INFORMATION

Known components are \_\_\_\_\_  
Dry Cleaning Solvent used Perchloroethylene  
Filter Cartridge Type: Regular \_\_\_\_\_ Jumbo \_\_\_\_\_ Jumbo(split) \_\_\_\_\_  
On-Site Reclamation by: Still \_\_\_\_\_ Sparger \_\_\_\_\_ None \_\_\_\_\_  
Forms of Waste(X): Cartridges \_\_\_\_\_ Still Bottoms \_\_\_\_\_ Filter Residue \_\_\_\_\_ Solvent \_\_\_\_\_  
Rate of Production of Waste \_\_\_\_\_ Pounds/Month. \_\_\_\_\_  
Is this waste stored in a segregated area? \_\_\_\_\_ YES \_\_\_\_\_ NO. If not, please describe other materials stored nearby \_\_\_\_\_

GENERAL WASTESTREAM INFORMATION

List other sources of WASTE which could accidentally be mixed with this wastestream \_\_\_\_\_  
\_\_\_\_\_  
List any materials used on site which could be incompatible with this wastestream (ie. acids, caustics....other).  
\_\_\_\_\_  
Describe procedure for managing WASTES on site to prevent cross-contamination \_\_\_\_\_  
\_\_\_\_\_

ADDITIONAL INFORMATION

In storage, drum bungs must be kept in place to prevent evaporation and/or water contamination.  
Generator must be willing to notify CSI of any significant variations in this wastestream.  
Wastes sent to CSI must not contain PCB's or Radioactivity.

ANALYSIS/VERIFICATION

Does generator have current analysis data? \_\_\_\_\_ YES \_\_\_\_\_ NO. Does generator have current Material Safety Data Sheet(s) of component(s)? \_\_\_\_\_ YES \_\_\_\_\_ NO. Please attach copies of analysis and/or MSDS's.  
Waste sampled by \_\_\_\_\_ GENERATOR \_\_\_\_\_ CSI REPRESENTATIVE \_\_\_\_\_ OTHER. Date sampled \_\_\_\_\_  
CSI Representative collecting information \_\_\_\_\_ Date \_\_\_\_\_  
CERTIFICATION STATEMENT: I certify to the best of my knowledge and ability that the information is accurate, complete, and true. I realize there may be additional costs toward final disposal of this waste if there is SIGNIFICANT variation between the information and the actual waste received by CSI.  
COMPANY REPRESENTATIVE(signature) \_\_\_\_\_ Date \_\_\_\_\_  
COMMENTS \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Copies: Process Engineer, Generator, CSI Representative, File

## 26. APPENDIX A

One industry that has just recently been affected by environmental regulations is the drycleaning industry. More and more drycleaners are looking for a way to dispose of their filter cartridges and waste perchloroethylene. With hazardous waste landfills becoming more restricted, economic alternatives are being sought. Reid Supply already sells filters and perchloroethylene to its customers and would like to help them with their disposal dilemma.

Reid Supply has determined a way of handling drycleaning waste which complements what it is already doing with the wastestreams it presently receives from customers. Perchloroethylene still bottoms from drycleaning are already being blended with other high BTU/pound solvent to be used as a cement kiln fuel source. However, perchloroethylene still bottoms suitable for blending as fuel are generated only by plants that have efficient stills. Many plants for one reason or another cannot drive off enough perchloroethylene to raise the BTU/pound level above 8,000 which is required at the moment by the KDHE and EPA. But the real problem is disposing of the perchloroethylene filter cartridge. The perchloroethylene content must be reduced to .1 percent before the cartridge can be thrown away in a sanitary landfill. The problem is compounded by the fact that most filters used today have an activated carbon core to enhance filtering. This carbon core is very difficult to strip of perchloroethylene even with special equipment. Although the paper part of the cartridge may be below .10 percent the activated carbon core does not get much below 3.0 percent perchloroethylene.

In order to solve this problem, Reid Supply intends to purchase a unit that will strip perchloroethylene from cartridges and also distill waste perchloroethylene. A picture of one is included. This unit will allow perchloroethylene to be recycled and reduce the perchloroethylene content to below .10 percent for the paper part of the filter and to about 3.0 percent for the carbon core. The paper and metal part of the filter can be discarded but the carbon as well as any still bottoms still have to be treated as hazardous waste. The still bottoms will be distilled to the point that the BTU/pound level was at least 8,000 and then be blended for fuel at a cement kiln. The carbon can be removed and ground

to a size that will pass through the cement kiln's filter system. Reid Supply would acquire a suitable grinder for this. The carbon having a BTU/pound over 8,000 could then be blended with waste solvent and used as fuel at the cement kiln. This plan would solve the undesirable problems of drycleaning wastestreams while reducing energy consumption and reclaiming perchloroethylene for future use.

Since the drycleaning waste is relatively consistent industry wide and generated in a closed system, it should be simple to show that no involved analysis would be necessary to receive this specific type of waste. At this point Reid Supply needs to collect data to develop a responsible yet economic scheme for drycleaning waste disposal.

Additional considerations are that most drycleaners collect their perchloroethylene sludge in DOT 37B60 five gallon containers. This would be a new type of hazardous waste storage container for Reid Supply besides 17E and 17H drums. Training for opening filter cartridges, grinding carbon, and still operation would be necessary.

Drycleaning waste is a natural direction for Reid Supply to go. There would be minor adjustments to handle the waste and therefore, there would be minor changes to the present permit. Reid Supply would like to keep this avenue open for discussion and review with the KDHE and the EPA so that there would be flexibility within the Part B permit to handle drycleaning waste in the way previously described.

# HYDROCARBON RECYCLERS, INC.

P.O. Box 9557 • Tulsa, Oklahoma 74157

## SALES

5000 So. 45th West Ave.  
Tulsa, Oklahoma 74107  
(918) 445-2171

## PLANT

5354 W. 46th Street South  
Tulsa, Oklahoma 74107  
(918) 446-7434

14 September 1987

Conservation Services, Inc.  
Mr. David Trombold  
2525 North New York  
Wichita, KS 67219

Dear David:

Enclosed please find Hydrocarbon Recyclers' detailed written closure cost estimate for hazardous waste disposal, tank and piping cleanup, hazardous waste area cleanup, and disposal of tank cleaning residue. The individual costs in Sections 1 and 4 shall include freight costs.

1) Hazardous Waste Disposal (includes labor and freight).

a) 17 E drums of water-based waste 50 drums @ \$30.00 each =	\$ 1,500.00
b) 17 H drums of solid flammable waste 80 drums @ \$55.00 each =	4,400.00
c) 17 E drums of recoverable chlorinated solvents 45 drums @ no charge =	----
d) 17 E drums of non-recoverable chlorinated solvents 5 drums @ \$55.00 each =	275.00
e) 30-gallon poly drums of incineration waste 120 drums @ \$180.00 each =	21,600.00
f) 17 E drums of flammable liquids 200 drums @ \$30.00 each =	6,000.00
g) Flammable liquids in tanks (bulk) 19,000 gallons @ \$0.25/gallon =	<u>4,750.00</u>
Total	\$38,525.00

2) Tank and Piping Cleanup (includes labor).

a) 1 - 12,000-gallon tank @ \$326.00 each =	326.00
b) 2 - 4,500-gallon tanks @ \$228.00 each =	456.00
c) 1 - 4,000-gallon tank @ \$228.00 each =	228.00
d) 1 - 1,200-gallon tank @ \$132.00 each =	132.00



Mr. David Trombold

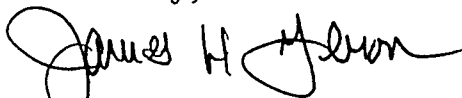
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14 September 1987

e) 1 - 1,000-gallon tank @ \$132.00 each =	\$ 132.00
f) 2 - 750-gallon tanks @ \$132.00 each =	264.00
g) 1 - 600-gallon tank @ \$132.00 each =	132.00
h) 1 - 500-gallon tank @ \$132.00 each =	132.00
i) 1 - 100-gallon tank @ \$66.00 each =	66.00
j) Piping - 100 feet @ \$2.40/ft =	<u>240.00</u>
Total	\$ 2,108.00
3) Hazardous Waste Area Cleanup.	
a) Drum storage area cleanup 2 men x 8 hours @ \$7.00/hour =	112.00
b) Drum processing area 2 men x 8 hours @ \$7.00/hour =	112.00
c) Still processing area 1 man x 8 hours @ \$7.00/hour =	<u>56.00</u>
Total	\$ 280.00
4) Disposal of Tank Cleaning Residue (includes labor and freight).	
a) 19 - 55-gallon drums of water from steam clean @ \$55.00 each =	1,045.00
b) 4 - 55-gallon drums of sand from sandblasting @ \$55.00 each =	<u>220.00</u>
Total	\$ 1,265.00
5) Engineering Costs for On-site Inspection	<u>300.00</u>
Total	\$ 300.00
GRAND TOTAL FOR CLOSURE ESTIMATE =	<u>\$42,478.00</u>

If you should have any questions or need any additional information concerning this estimated closure cost, please do not hesitate to contact me.

Sincerely,



James H. Gibson  
Sales Manager

JHG:at

SERVICE CHEMICAL SUPPLY, INC.  
 DRUM ANALYSIS RESULTS BY GAS  
 CHROMATOGRAPHY

<u>Drum Number</u>		Composition (% by volume)
1	1,1,1 Trichloroethane	100
2	Acetone	100
3	1,1,1 Trichloroethane	100
4	Trichloroethylene	64
	Acetone	36
5	MEK	100
6	Methanol	40
	MEK	30
	Trichloroethylene	30
7	1,1,1 Trichloroethane	100
8	Acetone	49
	Trichloroethylene	40
	Unidentified	11
9	Trichloroethylene	69
	Acetone	31
10	Methanol	48
	MEK	26
	Trichloroethylene	26
11	Methanol	21
	MEK	21
	Trichloroethylene	21
	1,1,1 Trichloroethane	11
	Unidentified	8

## Drum Number (cont.)

## Composition (% by volume)

12	Methanol	39
	MEK	21
	Trichloroethylene	21
	1,1,1 Trichloroethane	11
13	Methanol	48
	MEK	26
	Trichloroethylene	26
14	Ethanol	100
15	Trichloroethylene	88
	Methanol	12
16	1,1,1 Trichloroethane	100
17	Methanol	84
	Trichloroethylene	16
18	Methanol	40
	Trichloroethylene	16
	Ethyl Acetate	12
19	Methanol	40
	MEK	24
	Ethyl Acetate	12
	Trichloroethylene	12
	Unidentified	12
20	Methanol	40
	MEK	32
	Trichloroethylene	16
	Ethyl Acetate	12

Drum Number (cont.)

Composition (% by volume)

21

Methanol

40

MEK

32

Trichloroethylene

16

Ethyl Acetate

12

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WASTE  
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